



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

CERTIFIED MAIL
Return Receipt Requested
May 2, 2013

Case ID: 138331

Drake Cement LLC
Attention: Kevin Kitchen
5745 N. Scottsdale Rd., Ste. B-135
Scottsdale, AZ 85250-5902

Re: Notice of Violation issued to Drake Cement LLC

Dear Mr. Kitchen

This letter constitutes the monthly update on the status of Arizona Department of Environmental Quality ("ADEQ") action resulting from ADEQ's inspection of the above-referenced site on February 25, March 5, and March 19, 2013, as required by A.R.S. § 41-1009(I).

The attached Notice of Violation ("NOV") is an informal compliance assurance tool used by ADEQ to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. It describes the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing these remedies. However, the timeliness of a complete response to this notice will be considered by ADEQ in determining if and how to pursue such remedies.

Sincerely,

Pamela Nicola, Manager
Air Quality Inspection & Field Services Unit

Cc: Marco Gomez-Barrios, Drake Cement LLC ✓

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

Printed on recycled paper



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Case ID #: 138331

May 2, 2013

Drake Cement LLC
Attention: Kevin L. Kitchen
5745 N Scottsdale Rd
Ste B-135
Scottsdale, AZ 85250-5902

Subject: Drake Cement- Drake Road Site, Place ID 15847
5001 E. Drake Road

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Drake Cement LLC as the owner/operator of Drake Cement- Drake Road Site has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on March 19, 2013.

I. LEGAL AUTHORITY and NATURE OF ALLEGED SIGNIFICANT VIOLATION(S)

1. Permit 53336 - Attachment B., Section I.B.2.a

Cement clinker produced in the Rotary Kiln shall not exceed 83.33 tons per hour (TPH) based on an hourly rolling 3-hour average.

The facility exceeded the 83.33 TPH based on the hourly 3-hour average period for 137 periods between May 22, 2012 and July 28, 2012 according to the facility's "Main Stack-Clinker Production ton/hr" report. The dates of exceedances, number of 3-hour average periods on that date, and values in TPH are included in Attachment A.

2. Permit 53336 - Attachment B, Section I.B.9.a

The Permittee shall not cause or allow to be emitted into the atmosphere from the Main Stack any gases which contain ammonia in excess of 19.8 tons per year, based on a rolling 12-month sum.

The facility has not maintained records for ammonia emissions data from the main stack.

3. Permit 53336 - Attachment B, Section I.D.2

For each emission limit requiring submittal and approval of an emission monitoring plan the Permittee shall develop an emission monitoring plan in accordance with the requirements of 40 CFR 63.1350(p) to the director.

The facility has not prepared and submitted an emission monitoring plan to ADEQ.

4. Permit 53336 - Attachment B, Section VI.B.1.a-c

a.) The Permittee shall not cause or allow blasting in the quarry to exceed 1 blast per day or 48 blasts per year.

c.) The Permittee shall not cause or allow explosive usage in the quarry to exceed 5.26 tons per blast.

The facility exceeded more than one blast per day on July 31, 2012. The facility had 17 dates of exceedances from January 6, 2011 to February 14, 2013 and ranged from 5.356 to 11.878 tons of ANFO per blast according to the "Quarry Blasting Record" report. The dates of exceedances and the amount of ANFO in tons per blast is included in Attachment A.

5. Permit 53336 - Attachment B, Section III.D.2.a-b

a.) The Permittee shall calibrate, maintain, and operate, according to the manufacturer's specifications, devices for monitoring and recording the pressure drop across each dust collector listed in Condition III.A.

b.) The Permittee shall perform monthly inspections of each dust collector listed in Condition III.A, and the associated pressure drop continuous parameter monitoring systems, in accordance with the manufacturer's recommended procedures. The Permittee shall take corrective action following the discovery of any abnormal operation or required maintenance of any dust collector pressure drop continuous parameter monitoring system as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, but no later than within 24 hours following detection.

The facility representatives stated that they have not calibrated any pressure drop device and, therefore, did not have any records to indicate the calibration activity. The ADEQ inspector reviewed the pressure drop data for the baghouses, which revealed the reporting was not complete and the values reported had a negative value (Attachment B).

6. Permit 53336 - Attachment B, Section I.D.8.o

Annual inspections, maintenance, excursions, and corrective action measures for Baghouses BH-5.30 and BH-10.13 and the associated COMS and pressure drop continuous parameter monitoring systems shall be recorded and reported in accordance with Condition XII.B of Attachment A.

The ADEQ inspector reviewed the data included in the facility's "Main Baghouse DP and Clinker Cooler Baghouse DP" reports, which revealed the reporting was not complete and all of the values reported had a negative value (Attachment B).

7. Permit 53336 - Attachment B, Section I.D.11.a.x

The Permittee shall keep records of actions taken during periods of malfunction to minimize emissions in accordance with I.C.5 including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The facility has not prepared or submitted a corrective action plan to ADEQ. In a letter dated 12/21/2012 "Action Items and Deviation Report from December 17, 2012 Meeting", the facility

informed ADEQ that a plan will be submitted by March 31, 2013. To date, no plan has been submitted to ADEQ.

8. Permit 53336 - Attachment B, Section II.D.4.a

The Permittee shall develop and submit to the Department an opacity emissions monitoring plan in accordance with the requirements in 40 CFR 63.1350(p)(1) through 63.1350(p)(4).

The ADEQ file review revealed that the facility has not prepared and submitted the opacity emissions monitoring plan to ADEQ.

9. Permit 53336 - Attachment B, Section IV.D.2.b

The Permittee shall perform monthly inspections of Dust Collector DC-12.7.1, and the associated pressure drop continuous parameter monitoring system, in accordance with the manufacturer's recommended procedures. The Permittee shall take corrective action following the discovery of any abnormal operation or required maintenance of the dust collector pressure drop continuous parameter monitoring system as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, but no later than within 24 hours following detection.

The ADEQ inspector reviewed the pressure drop data for the baghouses, which revealed the reporting was not complete and all of the values reported had a negative value (Attachment B).

10. Permit 53336 - Attachment B, Section VI.B.2.a

All roads within the Cement Plant Process Area Boundary shall be paved and shall be maintained in a paved condition.

The ADEQ inspector observed that there are several dirt roadways that are not paved within the process area boundary (Attachment C depicts which roads/areas not paved).

11. Permit 53336 - Attachment B, Section VI.B.2.b.i

All paved roads shall be watered and vacuumed on all operating days except when roads are damp due to normal precipitation.

The ADEQ inspector verified that the facility has not purchased or utilized a vacuum truck(s) per the permit condition to meet BACT.

12. Permit 53336 - Attachment B, Section I.D.7.b-i

b.) The Permittee shall continuously monitor and record the temperature of the exhaust gases from the kiln, in-line kiln/raw mill at the Inlet to, or upstream of, the kiln, and in-line kiln/raw mill baghouses.

c.) The required minimum data collection frequency shall be one minute.

d.) Each hour, calculate the three-hour average temperature for the previous 3 hours of process operation using all of the one-minute data available (i.e., the CMS is not out-of-control.)

e.) When the operating status of the raw mill of the in-line kiln/raw mill is changed from off to on or from on to off, the calculation of the three-hour rolling average temperature shall begin anew, without considering previous recordings.

f.) The three-hour rolling average temperature shall be calculated as the average of 180 successive one-minute average temperatures.

h.) When the operating status of the Raw Mill is changed from off to on, or from on to off, the calculation of the three-hour rolling average temperature shall begin anew, without considering previous recordings.

i.) The calibration of all thermocouples and other temperature sensors shall be verified at least once every three months.

The facility has not correctly recorded the temperature of the exhaust gases from the kiln, in-line kiln/raw mill at the inlet to, or upstream of, the kiln, and in-line kiln/raw mill baghouses. In the "Actions Items and Deviation Report from December 17, 2012", Drake cement stated "the facility relies on the temperature instrumentation readouts in the facility's control room during operation of the cement plant, which displays the actual temperatures of each designated source. The DCS system is not recording the data correctly and the archiving abilities are poor".

Review of the temperature data for baghouse BH-5.30 revealed the facility is reporting in approximately 8 minute intervals (Attachment D).

The facility has no records to comply with conditions d. through h. above.

The facility has not calibrated all thermocouples and other applicable temperature sensors for verification once every three months. The ADEQ inspector met with an electrical supervisor during the inspection of March 5, 2013 and he stated that they have not calibrated any thermocouple or temperature device including replacement devices since the plant became operational.

13. Permit 53336 - Attachment B, Section I.D.8.g-n

g.) The Permittee shall continuously monitor and record the pressure drop across Baghouses BH-5.30 and BH-10.13. The output of the pressure drop continuous parameter monitoring systems shall be recorded on circular charts or other permanent format and shall be maintained on site readily available for inspection.

h.) The pressure drop continuous parameter monitoring systems shall meet the performance criteria contained in the approved CAM plans.

i.) Each time the pressure drop across Baghouse BH-5.30 falls outside the range of 2-

8 inches H₂O shall constitute an excursion.

k.) Each time the pressure drop across Baghouse BH-10.13 falls outside the range of 2-8 inches H₂O shall constitute an excursion.

m.) The Permittee shall take corrective action following each pressure drop or opacity excursion as defined in Conditions I.D.8.i through I.D.8.l. Corrective action to restore the baghouse(s) to normal operation shall be taken as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and in all cases shall be initiated within 24 hours following detection of an excursion.

n.) The Permittee shall perform monthly inspections of Baghouses BH-5.30 and BH-10.13 and the associated pressure drop continuous parameter monitoring systems in accordance with the manufacturer's recommended procedures. The Permittee shall take corrective action following the discovery of any abnormal operation or required maintenance of Baghouses BH-5.30 and BH-10.13 or the associated pressure drop continuous parameter monitoring systems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, but no later than within 24 hours following detection.

The facility utilizes their DCS system for recording and storing pressure drop data rather than a circular chart or other permanent format. Data was not available during inspection and was sent to ADEQ on 3/25/2013. Review of the data revealed the reporting was not complete and all of the values reported had a negative value (Attachment A).

Review of the Compliance Assurance Monitoring (CAM) Plans revealed Drake Cement has not met the permit condition for the performance criteria contained in the approved CAM Plans for their pressure drop continuous parameter monitoring systems. The facility representatives stated that the DCS system has been unable to monitor correctly and archive continuous pressure drop data on a consistent basis.

The current pressure drop data and limitations for Baghouses BH-5.3 and BH-10.13 does not comply with permit conditions. The facility has not taken or documented corrective action following each pressure drop excursion for Baghouses BH-5.30 and BH-10.13. Review of the deviation reports submitted to ADEQ did not include any reported excursions or corrective action measures for Baghouses BH-5.30 and BH-10.13 regarding pressure drop and continuous parameter monitoring systems. The facility has not complied with recording and reporting functions in accordance with Permit Condition XII.B of Attachment A.

14. Permit 53336 - Attachment B, Section II.B.1.a-d

a.) The Permittee shall not cause or allow the amount of material unloaded at the Receiving Hopper for Railroad Cars to exceed 500 tons in any 3-hour period.

d.) The Permittee shall not cause or allow the amount of material unloaded at the Receiving Hopper for Trucks to exceed 600 tons in any 24-hour period.

The facility has had six exceedances of the 500 tons in any 3-hour period permit limit for railcar unloading operations from October 13, 2012 to January 12, 2013 and ranged from 500.8 to 505.2 tons in a 3-hour period (Attachment A).

The facility exceeded the 600 tons in any 24-hour period permit limit for truck unloading operations on January 1, 2013 with 603.23 tons (Attachment A).

15. Permit 53336 - Attachment B, Section I.B.5.a

The Permittee shall not cause or allow to be emitted into the atmosphere from the Main Stack any gases which contain NOx in excess of 95 lbs per hr based on an hourly rolling 24-hour average.

Review of the facility's "NOx 24 Hour Rolling Ave." report revealed the facility exceeded the 95 lbs per hour based on the hourly rolling 24-hour average 55 times. The dates of NOx exceedances ranged from May 24, 2012 to December 20, 2012 (Attachment A).

16. Permit 53336 - Attachment B, Section I.B.6

The Permittee shall not cause or allow to be emitted into the atmosphere from the Main Stack any gases which contain CO in excess of 3.6 lbs per ton of clinker based on an hourly rolling 3-hour average.

Review of the facility's "CO 3 HR Rolling Average" report revealed the facility exceeded the 3.6 lbs per ton of clinker produced based on the hourly rolling 3-hour average 101 times. The dates of the CO exceedances ranged from March 10, 2012 to April 1, 2013 (Attachment A).

II. LEGAL AUTHORITY and NATURE OF OTHER ALLEGED VIOLATION(S)

1. Permit 53336 - Attachment B, Section I.B.4

The Permittee shall not cause or allow to be emitted into the atmosphere from the Main Stack any gases which contain sulfur dioxide (SO2) emissions in excess of 21.9 tons per year based on a daily rolling 365-day sum.

The facility does not track and have reporting data listed in their continuous emission monitoring systems (CEMS) reporting spreadsheet for SO2 on a daily rolling 365-day sum in tons per year.

2. Permit 53336 - Attachment B, Section II.D.3.c.iii

The Permittee shall determine the 3-hour block average of all recorded readings.

The facility does not have reporting for this condition.

3. Permit 53336 - Attachment B, Section V.F.2

The Permittee shall maintain monthly records of engine operation in total hours per month and a rolling 12-month total in hours per year. The records shall include the purpose of operation and the duration of time the engine was operated.

The facility maintains a log for monthly hours, but the logs do not include a rolling 12-month total in hours per year, purpose of operation, and duration of specific times the engine was

operated.

4. Permit 53336 - Attachment B, Section VII.B.c.

The Permittee shall employ reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.

The ADEQ inspectors observed inadequate or a lack of watering for paved and unpaved surface roads. The unpaved roadway conditions south of the cement plant but within the plant's boundary was completely dry with deep powder areas where heavy equipment was operating at time of inspection. The ADEQ inspectors observed visible emissions in this area and were significant at times during the inspection of February 25, 2013. The facility has not complied with following reasonable precautions to prevent excessive amounts of particulate from becoming airborne for roadways in and around the cement process areas, unpaved access roads to the quarry, and other applicable unpaved roads within the boundaries of the cement plant and limestone quarry.

III. DOCUMENTING COMPLIANCE

1. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a corrective action plan to prevent exceeding the 83.33 TPH limit for the cement clinker production in the rotary kiln.
2. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for calculating SO₂ on a daily rolling 365-day sum in tons per year since monitoring began.
3. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report documenting ammonia emissions from the main stack on a rolling 12-month sum.
4. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or an emissions monitoring plan to ADEQ.
5. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report documenting the temperature of the exhaust gases from the kiln, in-line kiln/raw mill at the inlet to, or upstream of, the kiln, and in-line kiln/raw mill baghouses and the reason for malfunction of temperature sensors and data acquisition related issues; the required minimum data collection frequency of one minute for the temperature of the exhaust gases from the kiln, in-line kiln/raw mill at the inlet to, or upstream of, the kiln, and in-line kiln/raw mill baghouses; the required minimum data collection frequency of one minute for the temperature of the exhaust gases from the kiln, in-line kiln/raw mill at the inlet to, or upstream of, the kiln, and in-line kiln/raw mill baghouses; the three-hour rolling average temperature calculated as the average of 180 successive one-minute average temperatures of the raw mill of the in-line kiln/raw mill; and when the operating status of the Raw Mill is changed from off to on, or from on to off, the calculation of the three-hour rolling average temperature shall begin anew, without considering previous recordings.

6. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a documentation demonstrating calibrations have been completed for all thermocouples and other applicable temperature sensors for verification once every three months.
7. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the last complete month of pressure drop recordings for Baghouses BH-5.30 and BH-10.13.
8. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the past complete month to meet permit conditions for the performance criteria contained in the approved CAM plans for their pressure drop continuous parameter monitoring systems.
9. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation the pressure drop is within the range of 2-8 inches of H₂O across Baghouse BH-5.30 and BH-10.03.
10. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a plan to document corrective action following each pressure drop excursion for Baghouses BH-5.30 and BH-10.13.
11. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a corrective action plan to consistently monitor and record the pressure drop continuous monitoring systems for Baghouses BH-5.30 and BH-10.13 and for keeping records of actions taken during periods of malfunction to minimize emissions in accordance with permit condition I.C.5 including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
12. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or records for the past full month for the 500 tons in any 3-hour period for unloading railroad cars into receiving hopper and the 600 tons in any 24-hour period for unloading trucks into storage building.
13. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the past full month for the 3-hour block average for the bag leak detection systems recorded readings for Dust Collectors DC-13.19, DC-13.20, and DC-13.40.
14. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or an opacity emissions monitoring plan.
15. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the past full month for calibrations, maintenance, and operations, according to manufacturer's specifications, devices for monitoring and recording the pressure drop across each dust collector listed in Permit Condition III.A.
16. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the past full month for pressure drop recordings for Dust Collector DC-12.7.1.
17. Within 30 calendar days of receipt of this Notice, please submit documentation that the

violation(s) never occurred, or a new monthly log for the engine to include a rolling 12-month total in hours per year, the purpose of operation, and the duration of time the engine was operated to the log of monthly hours.

18. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a blasting report for the past two full months.
19. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a paving plan and time frame for paving all roads within the cement plant process area boundary in reference to the process boundary map.
20. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a plan and time frame for purchasing and operating a vacuum vehicle(s) to be utilized on all paved roads within the process area boundary.
21. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a corrective action plan and schedule to improve watering for all unpaved roads in the process area, to and from and within the quarry, and other applicable unpaved roads within the facility's property boundaries; to follow reasonable precautions to prevent excessive amounts of particulate from becoming airborne. These precautions must include procedures to be used during major maintenance activities during operation and downtime for the cement plant that have a high potential for release of excessive amounts of particulates; and to maintain paved roads during excessive periods of transporting of materials by truck or earth moving equipment and to maintain paved roads tire tracking activities while coming from an unpaved road to a paved road.
22. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for the past month for CEMS NO_x data, which will include corrective actions taken to the cement manufacturing process to reduce the NO_x emissions to meet the permit limitation.
23. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or provide a report for CEMS CO data, which will include corrective actions taken to the cement manufacturing process to reduce the CO emissions to meet the permit limitation.

IV. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: Tim Trestrail, Air Quality Inspections Team, 1110 W Washington St, Phoenix, AZ 85007 MC: 3415A-3

V. STATEMENT OF CONSEQUENCES

Significant Violations

1. The time frames within this Notice for achieving and documenting compliance for the violation(s) alleged in Section I of this Notice are firm limits. Failure to achieve or document compliance for the violation(s) alleged in Section I of this Notice within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames for achieving and documenting compliance for the violation(s) alleged in Section I of this Notice only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.
2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in Section I of this Notice as allowed by law.

Other Violations

3. ADEQ may take any enforcement action authorized by law for the violation(s) alleged in Section II of this Notice, if the violation(s) are not corrected, or if ADEQ determines that the violation(s) have not been corrected in the time frames within this Notice.

VI. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Tim Trestrail at (602) 771-4271.



Pamela Nicola, Manager
Air Quality Inspection & Field Services Unit



Tim Trestrail
Air Quality Inspections Team

Attachment “A”

Attachment A (continued)

4/29/12 = 7 periods avg. 4.33
4/30/12 = 2 periods avg. 477.9
5/1/12 = 6 periods avg. 82.75
5/3/12 = 3 periods avg. 4.0
5/23/12 = 3 periods avg. 7.73
5/25/12 = 1 period 3.7
7/11/12 = 3 periods avg. 5.27
7/12/12 = 3 periods avg. 10.03
7/15/12 = 4 periods avg. 4.88
10/19/12 = 2 periods avg. 4.4
• 4/1/13 = 1 period 4.0 (received fax 4/2/2013)

Review of the railroad cars unloading records indicate the following dates of exceedances for unloading railroad cars into the receiving hopper that exceed 500 tons in any 3-hour period [Att. B, Sec. II.B.1.a]:

10/13/12 = 2 periods @ 500.8 tons each
10/14/12 = 1 period 500.8 tons
1/1/13 = 1 period 505.2 tons
1/12/13 = 2 periods @ 501.95 tons each

Building that exceed 600 tons in any 24-hr period [Att. B, Sec. II.B.1.d]:

1/1/13 = 603.23 tons

The dates of when the explosive usage in the quarry exceeded the permit limitation of 5.26 tons per blast are shown below. [Att. B, Sec. VI.B.1.c] These dates ranged from January 6, 2011 to February 14, 2013 and prior to the facility submitting a minor permit revision (#57657) to increase the explosives limit to 12.5 tons per blast. The revision was submitted by the facility on February 14, 2013 and ADEQ approved the revision on March 18, 2013.

1/6/2011 = 7.784 tons of ANFO per blast
2/15/2011 = 5.904 "
10/17/2011 = 5.858 "
10/27/2011 = 8.948 "
2/24/2012 = 9.242 "
3/13/2012 = 8.844 "
5/11/2012 = 8.549 "
5/29/2012 = 6.426 "
6/14/2012 = 7.552 "
7/31/2012 = 8.794 "
8/3/2012 = 7.764 "
8/20/2012 = 8.971 "
8/28/2012 = 7.660 "
9/11/2012 = 8.141 "
9/27/2012 = 11.878 "
10/15/2012 = 10.350 "
2/14/2013 = 5.356 "

Attachment A

Dates of exceedances of 83.33 tons per hour (TPH) based on an hourly 3-hour average for clinker produced in the Rotary Kiln. [Att. B, Sec. I.B.2.a] Review of the clinker production log revealed Drake Cement exceeded the hourly 3-hour average limitation of 83.33 TPH approximately 134 times for clinker produced in the rotary kiln.

5/22/12 = 2 periods avg. 83.84
5/25/12 = 12 periods avg. 89
5/28/12 = 17 periods avg. 84.47
5/29/12 = 1 period = 84.44
7/20/12 = 1 period = 83.47
7/23/12 = 3 periods avg. 84.32
7/24/12 = 22 periods avg. 83.70
7/25/12 = 24 periods avg. 84.08
7/26/12 = 21 periods avg. 85.39
7/27/12 = 24 periods avg. 85.7
7/28/12 = 7 periods avg. 84.68

Review of the CEMs reporting spreadsheet revealed Drake Cement exceeded the NO_x hourly rolling 24-hour average limitation of 95 lbs/hr for the following dates. [Att. B, Sec. I.B.5.a]
(ADEQ received excess emission report for the following events):

4/3/12 = 12 periods avg. 98.4 (NOV issued – Case #131257)
5/24/12 = 23 periods avg. 115.8
7/11/12 = 2 periods avg. 96.0
7/19/12 = 20 periods avg. 101.2
9/19/12 = 8 periods avg. 97.1
12/20/12 = 2 periods avg. 97.0

Review of the CEMs reporting spreadsheet revealed Drake Cement exceeded the CO hourly rolling 3-hour average limitation of 3.6 lbs/ton of clinker produced for the following dates. [Att. B, Sec. I.B.6]
(ADEQ received excess emission report for the following events):

3/10/12 = 3 periods avg. 3.91
3/11/12 = 11 periods avg. 5.58
3/25/12 = 3 periods avg. 3.98
3/30/12 = 2 periods avg. 3.88
3/31/12 = 5 periods avg. 5.89
4/1/12 = 7 periods avg. 4.38
4/2/12 = 5 periods avg. 3.96
4/3/12 = 2 periods avg. 3.85
4/10/12 = 2 periods avg. 4.1
4/13/12 = 3 periods avg. 4.07
4/17/12 = 3 periods avg. 4.03
4/21/12 = 4 periods avg. 5.05
4/24/12 = 2 periods avg. 3.75
4/25/12 = 12 periods avg. 4.62
4/26/12 = 1 period 3.8
4/28/12 = 1 period 3.8

Attachment “B”

Attachment B

Log Time Stamp	Value	Data Quality
11-17-2012 00:00:00	-0.208265707	OK
11-17-2012 00:12:00	-0.236183167	OK
11-17-2012 00:24:00	-0.208944798	OK
11-17-2012 00:36:00	-0.236183167	OK
11-17-2012 00:48:00	-0.236183167	OK
11-17-2012 01:00:00	-0.208293408	OK
11-17-2012 01:12:00	-0.20803833	OK
11-17-2012 01:24:00	-0.20797956	OK
11-17-2012 01:36:00	-0.236183167	OK
11-17-2012 01:48:00	-0.236183167	OK
11-17-2012 02:00:00	-0.206892699	OK
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BH-5.30
OK

BH-10.13

Baghouse

Pressure Drop

Neg. values.

then 11/23/12
@ 22:36

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11-21-2012 06:36:00	-0.755069733 OK
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11-21-2012 07:24:00	-0.755667925 OK

11-21-2012 07:36:00	-0.755069733 OK
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11-21-2012 09:00:00	-0.783214569 OK
11-21-2012 09:12:00	-0.783214569 OK
11-21-2012 09:24:00	-0.783214569 OK
11-21-2012 09:36:00	-0.783214569 OK
11-21-2012 09:48:00	-0.783214569 OK
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11-23-2012 22:48:00	0 No Data
11-23-2012 23:00:00	0 No Data
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11-24-2012 07:12:00	0 No Data
11-24-2012 07:24:00	0 No Data
11-24-2012 07:36:00	0 No Data
11-24-2012 07:48:00	0 No Data
11-24-2012 08:00:00	0 No Data
11-24-2012 08:12:00	0 No Data

No Data
then 2/12/13
@ 12:48

Neg. Values
then 3/24/12
@ 23:48

Attachment “C”

Attachment “D”

Main Bt Inlet Temperature

Log Time Stamp	Value	Data Quality
02-19-2013 00:00:00	45.90050125	OK
02-19-2013 00:08:17	45.8719635	OK
02-19-2013 00:16:35	45.70000076	OK
02-19-2013 00:24:52	45.38615417	OK
02-19-2013 00:33:10	45.28273773	OK
02-19-2013 00:41:27	44.90617752	OK
02-19-2013 00:49:45	44.70000076	OK
02-19-2013 00:58:02	44.41382599	OK
02-19-2013 01:06:20	44.16231155	OK
02-19-2013 01:14:37	44.12705231	OK
02-19-2013 01:22:55	43.82489777	OK
02-19-2013 01:31:12	43.59999847	OK
02-19-2013 01:39:30	43.59999847	OK
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02-19-2013 01:56:05	43.20917892	OK
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02-19-2013 06:46:17	39.35477066	OK

No data available
prior to 2-19-13

DATA FROM 2/19/13
thru 3/25/13
(see next page)

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